

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

United States of America)	
v.)	
CHRISTOPHER LARUE)	Case No. 20-mj-2170
)	
)	
)	
)	

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 19, 2020 in the county of Bucks in the
Eastern District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 2113(a), (d)	Armed bank robbery
18 USC 924(c)	Brandishing a firearm during a crime of violence

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

/s/ Adam Sucheski

Complainant's signature

FBI SA Adam Sucheski

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/16/2020 12:51pm

/s/ Hon. Richard A. Lloret

Judge's signature

City and state: Philadelphia, PA

U.S. Magistrate Judge

Printed name and title

No. 20-mj-2170

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

I, Adam Sucheski, a Special Agent with the Federal Bureau of Investigation (FBI), Philadelphia Division, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI for over 14 years and am currently assigned to the Philadelphia Division's Fort Washington Resident Agency. While employed by the FBI, I have investigated federal criminal violations related to armed robberies, fugitives, art theft, drug trafficking, bank robberies, fugitives and threatening communications among other crimes. I have gained experience through training at the FBI Academy, prior law enforcement training, and everyday work related to conducting these types of investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. This case involves the investigation of CHRISTOPHER LARUE (LARUE) for bank robbery and related offenses in the Eastern District of Pennsylvania.

4. I submit this Affidavit in support of an application for a criminal complaint and an arrest warrant for CHRISTOPHER LARUE, based on the evidence described below, which I submit constitutes probable cause to believe that LARUE violated 18 U.S.C. §§ 2113(a), (d) (Bank Robbery) and 924(c) (Brandishing a Firearm during a Crime of Violence).

5. The information in this Affidavit is based, among other things, on my own investigation, and information from interviews, a cooperating witness, internet communications, bank and other records, and other law enforcement officers. I submit this Affidavit for the limited purpose of establishing probable cause for arrest warrants; therefore, I have not recited every fact I know about this investigation.

LEGAL AUTHORITY

6. 18 U.S.C. § 2113(a) states that “Whoever, by force and violence, or by intimidation, takes, or attempts to take, from the person or presence of another, or obtains or attempts to obtain by extortion any property or money or any other thing of value belonging to, or in the care, custody, control, management, or possession of, any bank, credit union, or any savings and loan association” shall be guilty of an offense.

7. 18 U.S.C. 2113(d) makes it a crime to commit the offense of bank robbery by assaulting or putting in jeopardy the life of any person by the use of a dangerous weapon or device.

8. 18 U.S.C. § 924(c) makes it a crime, during and in relation to any crime of violence to use and carry a firearm, or in furtherance of any such crime, to possesses a firearm, or brandish a firearm.

PROBABLE CAUSE

9. On October 19, 2020, at approximately 8:30 a.m., Perkasie Borough Police Department was dispatched to a silent holdup alarm at the Quakertown National Bank (QNB) located at 607 West Chestnut Street, Perkasie Borough, Bucks County, Pennsylvania, which is in the Eastern District of Pennsylvania.

10. The tellers reported to police that a white male, approximately 5'6" to 5'7" tall, entered the bank following a teller who had arrived to open the bank. The suspect was wearing a dark ski mask with a hood covering his head and all dark clothing. The suspect was also wearing black boots and had a dark colored backpack. The suspect announced a robbery and demanded that the safe be opened. The suspect was told that another employee was needed to open the vault. Another employee entered the bank and the suspect took all the phones from the three employees present and had them open the safe. The suspect was then given two cash drawers from the safe

containing U.S. currency. The suspect then demanded the cash from the tellers' drawers. The cash from two teller drawers was provided. The suspect at one point produced a small handgun from his pocket and stated that he did not want to hurt anyone. Prior to leaving, the suspect attempted to close the vault door locking the employees inside, however he could not secure the door.

11. I received notification of the activation of electronic tracking devices secreted in the money given to the subject. I observed that the tracking devices were active and were traveling south from the bank toward Conshohocken, Pennsylvania.

12. The tracking devices stopped in the area of 400 River Road, Conshohocken, Montgomery County, Pennsylvania, also located in the Eastern District of Pennsylvania.

13. Pennsylvania State Police Trooper Thomas Yates responded to the area to investigate and located a white work trailer (the "work trailer") at the Republic Services River Road Transfer Station. Trooper Yates entered the work trailer and observed CHRISTOPHER LARUE standing at an open locker with the name "LARUE" displayed on it. Trooper Yates advised that he observed a black backpack in the open locker, which was consistent with the item described by the tellers. Additionally, LARUE was visibly upset and agitated upon seeing Trooper Yates.

14. Trooper Yates attempted to secure LARUE for an investigatory detention and grabbed LARUE's left hand to apply handcuffs. LARUE began to struggle with the Trooper and attempted to stop his attempts to detain him. LARUE then drew a small silver handgun, later determined to be a North American Arms Guardian .32 caliber pistol, with his right hand and pointed it over his left shoulder at Trooper Yates's head and stated "Do you want to fucking die today?" while pulling the trigger multiple times. The firearm did not discharge a round.

15. To secure LARUE, Trooper Yates released his grip on LARUE's hand, at which time

LARUE racked the slide on the firearm to load the weapon. Trooper Yates was able to take physical control of LARUE and successfully secured him in handcuffs.

16. The investigating police departments, Perkasie Borough and the Pennsylvania State Police, obtained search warrants for the work trailer and LARUE's vehicle. The search of the work trailer, including LARUE's locker, resulted in the recovery of electronic tracking devices consistent with those utilized by QNB Bank, U.S. currency, a box of .32 caliber ammunition, a knit hat with eye holes, a magazine for a .32 caliber firearm, black sweatpants and other items.

17. Also recovered from the backpack inside the locker were "bait bills" which had been reported stolen from the bank. "Bait bills" are a pre-selected and recorded set of U.S. currency of which the bank maintains a record of the serial numbers. I have confirmed that the serial numbers of the money stolen from QNB Bank in Perkasie on October 19, 2020 matched the recovered "bait bills" inside the backpack from LARUE's locker.

18. On October 20, 2020, a representative of the Federal Deposit Insurance Corporation (FDIC) confirmed that the QNB Bank branch noted above was insured at the time of the bank robbery.

19. For the foregoing reasons, there is probable cause to believe that CHRISTOPHER LARUE violated 18 U.S.C. §§ 2113(a), (d) (Bank Robbery), and 924(c) (Brandishing a Firearm during a Crime of Violence), and therefore, I respectfully request that an Arrest Warrant be issued.

/s/ Adam Sucheski
ADAM SUCHESKI
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed
before me this 16th day of December 2020.

/s/ Richard A. Lloret
HONORABLE RICHARD A. LLORET
United States Magistrate Judge